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April 28, 1992

Ms. Mary Anne Daly
U.S. ENVIRONMENTAL PROTECTION AGENCY
PRP Search Section (3HW11)
841 Chestnut Building
Philadelphia, PA 19107

Dear Ms. Daly:

Following up the letter of March 24, 1992 signed by Mr. Larry S. Miller, Chief PRP Search Section and our subsequent discussion, this correspondence will serve as our response to that letter pertaining to Crossley Farm, Hereford Township, PA.

As a preliminary matter, Mr. Miller's letter requests information and documents relating to a time period ranging from the late 1950s through the mid 1970s. After reasonable investigation, no documents were discovered which are responsive to the information requests. Furthermore, the management personnel of Bally Engineered Structures, Inc. ("Bally") from that time period who were involved in the operations in question, and who may have information or knowledge regarding same, are no longer with the company. As a result, information regarding the items in Mr. Miller's letter is limited. In response to the specific questions raised in Mr. Miller's letter:

1. Pertaining to the lagoons:

- a. No solvent containing TCE was disposed of in the lagoons.
- b. None
- c. The contents of the lagoon were siphoned off into an adjoining creek. The individuals involved in this operation were Richard Leh and Gus Kriebel (deceased). No further information is available.
- d. TCE solvent was employed to clean mixing chambers in foam dispensing machines. After use TCE solvent was placed into 55 gallon drums and all arrangements made by Leonard Melcher, Sr. (deceased) to have drums picked up and disposed of by Gus Bales (deceased).

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1. e. Lagoons were used for disposal of waste water from porcelain department within plant.
 - We estimate that approximately 10,000 gallons per week of water with a ph of 6 was placed into the lagoon.
 - The contents of the lagoon were siphoned off into an adjoining creek. The individuals involved in this operation were Richard Leh and Gus Kriebel (deceased).
2. Pertaining to verbal/written agreement with Gus Bales for the disposal of styrofoam panels:
 - a. No knowledge of any time period covering such an agreement. No knowledge of any such agreement at all.
 - b. No knowledge of the dates of transportation and disposal nor any knowledge of estimated quantities of the waste.
 - c. No knowledge of disposal location.
 - d. No knowledge of names and position titles of employees responsible for the arrangement of the transportation and disposal.
3. Pertaining to verbal/written agreement with Gus Bales to clean out the company's incinerator and haul incinerator ash to disposal site:
 - a. No knowledge of any time period covering agreement. All arrangements made between Leonard Melcher, Sr. (deceased) and Gus Bales (deceased).
 - b. No knowledge of the dates of transportation and disposal nor any knowledge of estimated quantities of the waste.
 - c. No knowledge of disposal location.
 - d. As noted above, Mr. Melcher made the arrangements with Mr. Bales.
4. You requested statements pertaining to the company's waste disposal practices and requested the statements from George Prince, former Plant Manager and Stanley Miller, Maintenance Department Manager. George Prince is deceased, and Stanley Miller is no longer employed by Bally Engineered Structures. After reasonable investigation, the only present employee with such knowledge is Mr. Richard Leh, a stockroom employee, and information provided by Mr. Leh is included in the above response.

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You requested a brief explanation regarding the records retention policy of our company regarding waste disposal contracts and documents:

Beginning in 1982, all quarterly reports, annual reports, bi-annual reports along with all contracts and negotiations have been kept both as an original and as a copy which is kept in a safe. Records included in the file date from calendar year 1982 through present. Earlier records were not retained and are not available.

Ms. Daly, if I might be of any additional assistance, please do not hesitate to call on me.

Cordially,

BALLY ENGINEERED STRUCTURES, INC.



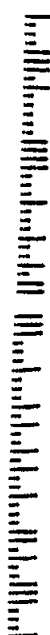
Lothar D. Gumberich
Vice President - Marketing

LDG/ch

cc: David Reis, Esquire (Thorp, Reed & Armstrong)

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CROSSLEY
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